

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TEYO JOHNSON, :
: Plaintiff, :
: :
-against- : Case No. 1:22-cv-06669(PAE)(GWG)
: :
EVERYREALM INC., COMPOUND ASSET :
MANAGEMENT LLC, REALM METAVERSE : DECLARATION OF
REAL ESTATE INC., REPUBLIC, REPUBLIC : LLOYD B. CHINN
CRYPTO LLC, REPUBLIC REALM MANAGER :
LLC, REPUBLIC REALM INC., REPUBLIC :
OPERATIONS LLC, OPENDEAL INC., :
OPENDEAL PORTAL LLC, JULIA SCHWARTZ :
in her individual and professional capacities, :
WILLIAM KERR in his individual and :
professional capacities, and JANINE YORIO in her :
individual and professional capacities. :
Defendants. :
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I, LLOYD B. CHINN, pursuant to 28 U.S.C. § 1746, affirm as follows:

1. I am a Partner with Proskauer Rose, LLP, attorneys for Defendants Everyrealm Inc. (“Everyrealm”), Julia Schwartz, William Kerr, and Janine Yorio (collectively “the Everyrealm Defendants”). I am fully familiar with the facts and circumstances recited herein.

2. I submit this Declaration in support of the Everyrealm Defendants’ Motion to Dismiss Plaintiff’s Sexual Harassment Claim.

3. On August 9, 2022, Plaintiff Teyo Johnson (“Johnson”) filed a Charge of Discrimination with the Equal Employment Opportunity Commission naming Everyrealm Inc. as a Respondent.

4. A true and correct copy of Johnson’s Charge of Discrimination is attached hereto as Exhibit A.

5. On July 11, 2022, Counsel for Plaintiff transmitted a letter threatening litigation against Everyrealm Inc. and others, and detailing Plaintiff's purported claims.

6. Plaintiff's July 11 communication was provided to me by Everyrealm on July 13, 2022.

7. I responded to Plaintiff's July 11 communication via letter on July 22, 2022.

8. In response to the Everyrealm Defendants' Motion to Compel Arbitration, Johnson referenced this "confidential letter to Defendants" which he mischaracterized as "informing them in detail of well-founded allegations of sexual harassment and other misconduct."

9. A true and correct copy of the July 11, 2022 Letter is attached hereto as Exhibit B. Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury the foregoing is true and correct.

Dated: November 2, 2022

/s/ Lloyd B. Chinn

Lloyd B. Chinn